

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

LAJERRAN LONG

Defendant

CRIMINAL No. 20-cr-10308-MLW

GOVERNMENT SENTENCING MEMORANDUM

This case involves a conspiracy to commit bank fraud that primarily included the following players: (1) the main actors that developed the scheme, (2) individuals who were paid to go into banks and present falsified credentials in order to obtain money from victim accounts, and (3) bank tellers that were recruited to accept the fake credentials without scrutiny in order to facilitate the fraudulent transfer of money. As can be seen in the Information to which Mr. Long pleaded guilty, ECF No. 23, Mr. Long does not fall neatly into any of these three primary categories. Instead, Mr. Long's part in this scheme was the recruitment of a bank teller, and facilitating a payment to that bank teller, on behalf of the "main actors" who came up with the scheme. While recruiting and paying the bank tellers was a relatively minor part in the grand scheme of this conspiracy, it was a necessary part nonetheless for which Mr. Long should be held accountable.

The government and the defendant agree that the applicable U.S. Sentencing Guidelines ("Guidelines") offense level is 13. *See* Def.'s Sentencing Mem. at 5-7, ECF No. 33. Per the plea agreement between the parties, the government recommends a sentence at the lowest end of the Guidelines range. As for restitution and forfeiture, the government and defense are also in

agreement. Mr. Long should forfeit the \$5,000 he received in this scheme, and the applicable restitution amount (\$357,333) should be apportioned among the defendants who also participated in this scheme. Given that the related cases are ongoing, apportionment may require a future order once the various parties have been identified and their cases adjudicated.

Respectfully submitted,

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Acting United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christopher J. Markham  
Christopher J. Markham  
Assistant United States Attorney

Date: October 5, 2021